

SUPPORTING STATEMENT – PART A

Certification of Affirmation of Enrollment Agreement – OMB 2900-0576

Summary of Changes from Currently Approved Collection

- The ICR is associated with rulemaking RIN 2900-AQ88
- Increased Annual Burden
- Updated the total Cost to all Respondents
- Updated the Cost to the Government

1. Need for the Information Collection

The Department of Veterans Affairs (VA) is authorized to pay educational benefits for correspondence training under chapters 30, 32, 33, 35, of title 38, and chapter 1606 of title 10, U.S. Code, and section 903 of Public Law 96-342. The statute provides that before VA can pay education benefits, the claimant must affirm in writing the enrollment agreement for the correspondence course after the expiration of 5 full days after the date that he or she signed the correspondence contract. Accordingly, VA Form 22-1999c, Certificate of Affirmation of Enrollment Agreement of Correspondence Course was developed to assist with this statutory requirement. The claimant either affirms the agreement or destroys this form. The claimant then notifies the correspondence school of this decision. If the agreement is affirmed, the claimant enters a date no later than the seventh day after the date the agreement was signed, signs the form, and then the claimant sends the completed form to the correspondence school. The correspondence School's Certifying Official attaches an enrollment certification to VA Form 22-1999c and sends both forms to VA for processing.

The following statutes and regulations require this information collection:

- a. 38 U.S.C. 3686(b)
- b. 38 U.S.C. 3323(a)
- c. 10 U.S.C. 16131
- d. 38 C.F.R. 21.4256 (b)

This collection of information is associated with the rulemaking, RIN 2900-AQ88.

2. Use of the Information

VA uses information from the current collection to pay education benefits for correspondence training. This information allows VA to determine if the claimant has been informed of the 5-day reflection period required by law.

3. Use of Information Technology

This collection has been converted to an electronic fillable format which is available on the internet.

4. Non-Duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Collecting this information at the established frequency is necessary for claimants to request education benefits based on approved correspondence training.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A. Public Comments

The associated proposed rule, RIN 2900-AQ88, was published in the Federal Register on May 24, 2023, Volume 88, Number 100, page 33672. No comments pertaining to the collections of information were received in response to this notice.

B. Consultation

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

VA Form 22-1999c is retained permanently in the claimant's education folder. Our assurance of confidentiality is covered by 38 U.S.C. 5701 and our System of Records, Compensation, Pension, Education and Veteran Readiness and Employment Records – VA (58VA21/22/28), which are contained in the Privacy Act Issuances, 2012 Compilation.

11. Sensitive Questions

None of the questions on this form are considered to be of a sensitive nature.

12. Respondents Burden and Its Labor Costs

Certificate of Affirmation of Enrollment Agreement - Correspondence Course
VA Form 22-1999c

- a. Number of Respondents: 75
- b. Frequency of Responses: Annually
- c. Annual Burden Hours: 4 (75 X 3min / 60 = 4)
- d. Estimated Completion Time: 3 minutes
- e. The respondent population for the VA Form 22-1999c consists of Veterans who are pursuing approved programs of education. VA cannot make further assumptions about the population of respondents because of the variability of factors such as educational background and wage potential of respondents. Therefore, VBA used general wage data for "All Occupations" to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$31.48 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website:
https://www.bls.gov/oes/current/oes_nat.htm

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$118 (75 responses per year x 3 minutes per application x \$31.48).

13. Respondent Costs other than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Certificate of Affirmation of Enrollment Agreement - Correspondence Course

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
09	05	3 min	\$32.56	\$1.62	75	\$121.50
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Overhead at 100% Salary						\$121.50
Overhead costs are 100% of salary and are the same as the wage listed above; and the amount is included in the total.						
Processing / Analyzing Costs						\$121.50
Printing and Production Cost						\$0
Total Cost to Government						\$121.50

Note: The hourly wage information above is based on the hourly 2024 General Schedule Pay. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx

15. Reasons for Change in Burden

The burden has increased since the previous approval due to a provision in the associated rulemaking, RIN 2900-AQ88, which constituted an increase in the estimated number of respondents, resulting in an increase in the reporting burden hours.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Act Submissions

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.